

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

MARTHA AXLEY,)	
)	
Plaintiff,)	
)	
v.)	Case No. 3:12-cv-00951
)	Judge Campbell
GALLATIN HEALTH CARE CENTER, LLC,)	Magistrate Judge Knowles
)	Jury Demand
Defendant.)	

MOTION TO EXTEND FACT DEPOSITION DEADLINE

Comes now the Plaintiff, by and through undersigned counsel, and hereby moves this Court for an extension of the deposition deadlines governing this case. Plaintiff's counsel will be filing a motion to withdraw as counsel after the requisite notice period outlined in Local Rule 83.01(g) expires on July 30, 2013. Although counsel for the parties had discussed and reserved some deposition dates that would comply with the current scheduling order deadline for fact witnesses of July 31, 2013, these dates fall within the 14 day notice period and Plaintiff has advised current counsel that she does not feel comfortable having current counsel defend and/or conduct the depositions on this case. Therefore, the Plaintiff needs additional time to conduct these depositions with new counsel or pro se. Adjusting this one fact witness deadline will not impact the dispositive motion deadline or current trial date. Plaintiff requests all other deadlines to remain the same, but that the fact witness deposition deadline be extended to November 29, 2013, which is one month prior to the current dispositive motion deadline. Plaintiff requests this extension so that she may have time to obtain new counsel and have that new counsel defend and conduct fact witness depositions in this case.

Therefore, because this adjustment does not negatively impact any other deadlines applicable in this case and because it is necessary to ensure Plaintiff is able to proceed in her case with counsel of her choice, Plaintiff requests this extension.

Respectfully submitted,

MICHAEL D. PONCE AND ASSOCIATES

s/Nina H. Parsley
Nina H. Parsley, [BPR No. 23818]
Michael D. Ponce & Associates
1000 Jackson Road, Suite 225
Goodlettsville, TN 37072
nina@poncelaw.com
(615) 851-1776
Attorney for the Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document has been served via the Court's electronic filing system and/or the United States mail, postage prepaid, to:

Lawrence S. Eastwood, Esq.
414 Union Street, Suite 1900
Bank of America Plaza
Nashville, TN 37219-1782

Martha Lorena Axley
35 McMurtry Road
Goodlettsville, TN 37072

on this the 16th day of July, 2013.

s/Nina H. Parsley